

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<u>STATE FARM MUTUAL AUTOMOBILE</u>	:	CIVIL ACTION
<u>INSURANCE COMPANY</u>	:	
	:	No. 2:15-cv-05929
vs.	:	
	:	JURY TRIAL
	:	DEMANDED
<u>LEONARD STAVROPOLSKIY, P.T., D.C.,</u>	:	
<u>Et. al.</u>	:	
	:	
<u>EASTERN APPROACH REHABILITATION,</u>	:	CIVIL ACTION
<u>LLC and AQUATIC THERAPY OF</u>	:	
<u>CHINATOWN, INC.</u>	:	No. 2:16-cv-01374
vs.	:	
	:	JURY TRIAL
	:	DEMANDED
<u>STATE FARM MUTUAL AUTOMOBILE</u>	:	
<u>INSURANCE COMPANY, et. al.</u>	:	

**MEMORANDUM OF LAW IN SUPPORT OF THE MOTION TO COMPEL
DISCOVERY RESPONSES & SANCTIONS**

The Eastern Approach Entities respectfully incorporate herein by reference the averments in the accompanying Motion.

Respectfully submitted,
BARATTA, RUSSELL & BARATTA

By: APB2
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